

Exhibit 2

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE
TRUJILLO, WILLIAM BYATT, JEREMY
DAVIS, and CHRISTOPHER CASTILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE FOR *DAUBERT* MOTION
(DKT. 703) AND MOTION TO STRIKE
(DKT. 705)**

The Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on June 21, 2022, Plaintiffs filed their Motion for Class Certification (Dkt.
4 609);

5 WHEREAS, on August 5, 2022, Google filed its Opposition to Plaintiffs’ Motion for Class
6 Certification (Dkt. 665), as well as three *Daubert* motions (Dkts. 662, 663, 664);

7 WHEREAS, on August 23, 2022, Plaintiffs filed a *Daubert* motion (Dkt. 703) and a motion
8 to strike four Google employee declarations submitted in support of Opposition to Plaintiffs’ Motion
9 for Class Certification (Dkt. 705);

10 Whereas, Google’s oppositions to Plaintiffs’ *Daubert* motion and motion to strike are
11 currently due on September 6, 2022;

12 WHEREAS, any replies in support of Plaintiff’s *Daubert* motion and motion to strike are
13 currently due on September 13, 2022;

14 WHEREAS, the hearing on Plaintiffs’ motion for class certification as well as Google’s
15 *Daubert* motions is currently scheduled for September 20, 2022 at 2:00 p.m. (Dkt. 669);

16 WHEREAS, the hearing on Plaintiffs’ *Daubert* motion and motion to strike is currently
17 scheduled for September 27, 2022 at 2:00 p.m.;

18 WHEREAS, Google has requested an extension of its deadline for any oppositions to
19 Plaintiffs’ *Daubert* motion and motion to strike, from September 6 to September 14;

20 WHEREAS, Google has agreed to reciprocally extend the deadline for Plaintiffs’ *Daubert*
21 motion and motion to strike from September 13 to September 21;

22 WHEREAS, Plaintiffs wish to ensure that any changes to the briefing schedules do not result
23 in any change to the September 20 or September 27 hearing dates;

24 WHEREAS, Google has represented that it will not seek to reschedule the September 20 or
25 September 27 hearing date based on these stipulated changes to these briefing schedules;

26 NOW THEREFORE, the Parties stipulate to the following deadlines:
27
28

- The deadline for Google to file its Opposition to Plaintiffs' *Daubert* motion and motion to strike (Dkts. 703, 705) is extended from September 6, 2022 to September 14, 2022.
- The deadline for Plaintiffs to file their Reply in support of their *Daubert* motion and motion to strike is extended from September 13, 2022 to September 21, 2022.

DATED: August 29, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Draft

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER. I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: August 29, 2022

By /s/ Draft
Draft
Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

- The deadline for Google to file its Opposition to Plaintiffs' *Daubert* motion and motion to strike (Dkts. 703, 705) is extended from September 6, 2022 to September 14, 2022.
- The deadline for Plaintiffs to file their Reply in support of their *Daubert* motion and motion to strike is extended from September 13, 2022 to September 21, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge